

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: JUN 27 2002

SUBJECT: Biological Technical Assistance Group Review
Dayco Corp./L.E. Carpenter Company site

FROM: *MC for* Mindy J. Pensak, Coordinator
Biological Technical Assistance Group (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager
New Jersey Remediation Branch (ERRD-NJRB)

The following comments represent the Region II Biological Technical Assistance Group (BTAG) review. The documents reviewed by the group were the "Nature and Extent of Lead Concentrations in Soil and Findings & Recommendations Regarding a Conceptual Free-Product Remediation Strategy," prepared by RMT, Inc., dated March 2002, for the Dayco Corp./L.E. Carpenter Company site located in Wharton Borough, Morris County, New Jersey.

One of the Project Objectives of the Nature and Extent of Lead Concentrations in Soil document is to determine if any further ecological risk assessments are necessary. However, there is no further information presented in the document regarding ecological risk. As noted in the previous BTAG memorandum (December 15, 2000), based on the elevated lead concentrations in the soil and in sediment from the drainage ditch and the Rockaway River an ecological risk assessment should be conducted.

The remediation goal for lead (600 ppm) is based on a non-residential soil cleanup value and, therefore, may not be appropriate for ecological receptors. The results of the ecological risk assessment should assist in determining the ecological protectiveness of the lead remediation goal.

An evaluation should be made to determine if the adjacent wetlands have been impacted by contaminants. These wetlands should be identified on Figure 2. In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

If you have any questions, comments, or require further information, please contact Michael Clemetson at (732) 321-6712.

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